

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

Affidavit in Support of Criminal Complaint

I, Bruno Ricardo, a Special Agent with the United States Department of Homeland Security, assigned to Homeland Security Investigations (hereinafter referred to as HSI) being duly sworn, depose and state as follows:

1. I am a Special Agent of the United States Department of Homeland Security (DHS). Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), San Juan, Puerto Rico and have been so employed since 2023. I am an investigative or law enforcement officer of the United States who is empowered to conduct investigations of or to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. As a Special Agent, my responsibilities include conducting investigations of the alleged manufacture, distribution and possession of controlled substances, importation of controlled substances, smuggling of goods into the United States, firearm's violations, and other related offenses.
2. I have attended the Homeland Security Investigations Special Agent Training (HSISAT) at the Federal Law Enforcement Training Center in Glynco, Georgia. I was trained in conducting investigations related to firearms narcotics smuggling, which includes interdiction and distribution activities where investigations commonly conducted are related to violations of Titles 8, 18, 19, 21 and 31 of the United States Code (USC).
3. Prior to my appointment as a Special Agent, I was employed as a United States Customs and Border Protection (CBP) Officer and was assigned as a sworn law enforcement officer to the San Francisco Port of Entry Area of Operations for approximately 11 months. During my tenure as CBP Officer, I have completed approximately 712 hours of instruction at the FLETC. During my training I received instruction on identifying fraudulent drug Interdictions, travel documents, interviewing techniques, identifying signs of deception, basic law enforcement skills, anti-

terrorism, immigration law, trade law, and search procedures.

4. Prior to my tenure as a CBP Officer, I was employed by the US Federal Bureau of Prisons (FBOP) for 7 years where I served in a variety of positions. These positions included Correctional Officer, Receiving & Discharge Officer, Legal mail Officer, Records Officer, and Acting Activities Lieutenant.
5. Prior to my employment with the FBOP I served in the US Army for 6 years both a Infantry team leader and a Military Intelligence HUMINT collector. As a HUMINT collector I have experience and training conducting interviews, interrogations, and running sources.
6. Your affiant is presently assigned to Homeland Security Investigations (HSI), San Juan, Airport Investigations and Tactical Team (AirTAT). The AirTAT investigates international drug trafficking and money laundering organizations that utilize the aviation domain to smuggle narcotics and currency into and through the United States.
7. As a Special Agent, your affiant's job and responsibilities include conducting investigations of alleged manufacturing, distributing or possession of controlled substances, 21 U.S.C. § 841 (a)(1)); importation of controlled substances 21 U.S.C. § 952 (a)); smuggling of goods into the United States, 21 U.S.C. § 545; Immigration violations Title 8, United States Code; possession with the intent to distribute narcotic drug controlled substances while onboard a vessel subject to the jurisdiction of the United States 46 U.S.C. § 70501 et seq.; and related offenses.
8. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, information conveyed to me by other law enforcement officials, and my review of records, documents, and other physical evidence obtained during this investigation. This affidavit is not intended to include every fact observed by me or known by the government. This affidavit is submitted for the limited purpose of establishing probable cause

for the criminal charges set forth herein and, therefore, does not contain each and every fact known to me or other law enforcement agents concerning this investigation.

9. This affidavit is being submitted for the limited purpose of securing a criminal complaint charging Alien's name with violating of 8 U.S.C. § 1326(a)(1)(2)(b)(2)(3)(4) "Reentry of Removed Aliens".

Facts in Support of Probable Cause

10. On February 27, 2025, HSI San Juan SAC Office met with Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO), regarding subject Pedro DE LA CRUZ-Rodriguez (hereinafter referred to as DE LA CRUZ-Rodriguez) which was a convicted criminal alien that was previously been deported from the United States. Furthermore, HSI agents received a photo and information that the subject frequented an address located at Malvis Street #966 Country Club, San Juan, Puerto Rico.
11. At approximately 04:50 P.M. subject DE LA CRUZ-Rodriguez was observed by HSI agents at the second floor of the previously mentioned address and shortly after that he was observed leaving the premises accompanied by a female. As agents began to approach, HSI Special Agent (SA) Gabriel Ortiz and (SA) Bruno Ricardo recognized DE LA CRUZ-Rodriguez from a photo that was provided by Immigration and Customs Enforcement/Enforcement and Removal Operations (ICE-ERO) walking on the sidewalk. Agents Ortiz and Bruno approached DE LA CRUZ-Rodriguez and asked him what his name was, to which he replied "Pedro". DE LA CRUZ-Rodriguez was then placed under arrest without further incidents and several IDs were found on him with the name Pedro Radhame DE LA CRUZ RODRIGUEZ on his person. DE LA CRUZ-Rodriguez was subsequently taken to the ICE/ERO processing center located at San Patricio, Guaynabo, Puerto Rico. A check in law enforcement databases based on his fingerprints and

biographic information confirmed DE LA CRUZ-Rodriguez identity and revealed he was a previously deported alien with criminal history.

12. DE LA CRUZ-Rodriguez is a citizen and national of the Dominican Republic and has been previously convicted in the U.S. District Court of Puerto Rico.
13. On March 12, 2002, DE LA CRUZ-RODRIGUEZ was granted a Voluntary Departure (VD) by a United States Immigration Judge until July 10, 2002. DE LA CRUZ-RODRIGUEZ failed to depart, and a Final Removal Order was issued. On October 16, 2002, DE LA CRUZ was removed to the Dominican Republic.
14. On July 30, 2007, subject was convicted for violations of 18 U.S.C. § 922 (g) (5) "Possession of a firearm by an illegal alien". On November 11, 2007, DE LA CRUZ was removed from the United States to the Dominican Republic following the reinstatement of the Final Removal Order.
15. On March 26, 2013, DE LA CRUZ-Rodriguez was also convicted for violations to 8 U.S.C. § 1326 "Re-entry by Aggravated Felon after Removal/Deportation". On January 3, 2014, DE LA CRUZ-Rodriguez was subsequently removed from the United States to the Dominican Republic on a reinstatement of the Final Removal Order.
16. DE LA CRUZ-Rodriguez was also convicted on March 15, 2016, for violation to 8 U.S.C. § 1326 (b) (2) "Re-entry of previously deported alien after felony conviction". On September 6, 2018, DELACRUZ-Rodriguez was subsequently removed from the United States to the Dominican Republic on a reinstatement of a Final Removal Order.
17. Between the date of his physical removal and February 27, 2025, the date he was found in the United States, DE LA CRUZ-Rodriguez had not applied for nor obtained permission to enter/reenter the United States from the Secretary of Homeland Security.

Conclusion

18. Based on my training and experience I respectfully believe that sufficient probable cause exists to show that there is material evidence present of the commission of a violation of United States federal law by Pedro DE LA CRUZ-Rodriguez for violations of 8 U.S.C. § 1326(a) & (b)(1) illegal reentry of a removed alien after a felony conviction. I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.



Bruno Ricardo, Special Agent
United States Department of Homeland Security
Immigration and Customs Enforcement
Homeland Security Investigations

Subscribe and sworn by telephone at 1:37 p.m. pursuant to the requirements of Federal Rules Criminal Procedures 4.1 on 2/28/2025, in San Juan, Puerto Rico.



**Digitally signed by
Hon. Giselle López-
Soler**

**UNITED STATES MAGISTRATE JUDGE
DISTRICT OF PUERTO RICO**